

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION CORPORATION, Plaintiff-Applicant, v. BERNARD L. MADOFF INVESTMENT SECURITIES LLC, Defendant.	Adv. Pro. No. 08-01789 (CGM) SIPA LIQUIDATION (Substantively Consolidated)
In re BERNARD L. MADOFF, Debtor.	Adv. Pro. No. 10-04468 (CGM)
IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC, Plaintiff, v. KEN-WEN FAMILY LIMITED PARTNERSHIP; KENNETH W. BROWN, in his capacity as a General Partner of the Ken-Wen Family Limited Partnership; and WENDY BROWN, in her capacity as a General Partner of the Ken-Wen Family Limited Partnership, Defendants.	

**JOINT STIPULATION AND ORDER REGARDING (I) ADJOURNING
DEFENDANT’S MOTION TO COMPEL *SINE DIE*, (II) BRIEFING SCHEDULE ON
DEFENDANT’S MOTION FOR SUMMARY JUDGMENT AND PLAINTIFF’S
CROSS-MOTION FOR SUMMARY JUDGMENT**

Irving H. Picard, as trustee (“Trustee”) for the liquidation of Bernard L. Madoff
Investment Securities LLC (“BLMIS”) under the Securities Investor Protection Act, 15 U.S.C.
§§ 78aaa–III, substantively consolidated with the chapter 7 estate of Bernard L. Madoff
(“Madoff”), and defendant Kenneth W. Brown (the “Defendant”, collectively, the “Parties”), by
and through the Parties’ undersigned counsel, state as follows:

WHEREAS on October 29, 2021, Defendant filed his *Motion to Compel Defendants Ken-Wen Family Limited Partnership and Wendy Brown to Respond to First Requests for Production of Documents* [Docket No. 172];

WHEREAS on November 5, 2021, the Trustee filed his *Objection to Defendant Kenneth W. Brown's Motion to Compel Defendants Ken-Wen Family Limited Partnership and Wendy Brown to Respond to First Requests for Production of Documents* [Docket No. 173];

WHEREAS on November 5, 2021, Defendant filed his *Motion for Summary Judgment* [Docket No. 174]; and

NOW, THEREFORE, the Parties agree and stipulate to the following:

1. Defendant's Motion to Compel shall be removed from the Agenda for the November 17, 2021 Omnibus Hearing and adjourned *sine die*.
2. The Trustee shall file and serve his opposition to Defendant's motion for summary judgment and cross-motion for summary judgment on or before December 1, 2021.
3. Defendant shall file his reply in support of his motion for summary judgment, and opposition to the Trustee's cross-motion on or before December 22, 2021.
4. The Trustee shall file his reply to Defendant's opposition to his cross-motion on or before January 5, 2022.

5. The Parties shall appear for a hearing on the Defendant's motion for summary judgment and the Trustee's cross-motion for summary judgment on above-referenced motions on January 19, 2022 at 10:00 A.M. (EST).

Dated: November 12, 2021
New York, New York

/s/ Michael S. Neiburg

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Trustee for the Substantively Consolidated
SIPA Liquidation of Bernard L. Madoff
Investment Securities LLC and the Estate of
Bernard L. Madoff*

/s/ Cecelia G. Morris

Hon. Cecelia G. Morris
Chief U.S. Bankruptcy Judge

Dated: November 15, 2021
Poughkeepsie, New York

